

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:	:	X
	:	Case No. 20-10766 (BLS)
QUORUM HEALTH CORPORATION, <i>et al.</i> ,	:	
	:	Chapter 11
Debtor.	:	
	:	
-----	:	X
DANIEL H. GOLDEN, AS LITIGATION TRUSTEE	:	
OF THE QHC LITIGATION TRUST, AND	:	
WILMINGTON SAVINGS FUND SOCIETY, FSB,	:	Adv. Pro. No. 21-51190 (BLS)
SOLELY IN ITS CAPACITY AS INDENTURE	:	
TRUSTEE,	:	
	:	
Plaintiffs,	:	Related Docket No. 57
	:	
v.	:	
	:	
COMMUNITY HEALTH SYSTEMS, INC.;	:	
CHS/COMMUNITY HEALTH SYSTEMS, INC.;	:	
REVENUE CYCLE SERVICE CENTER, LLC;	:	
CHSPSC, LLC; PROFESSIONAL ACCOUNT	:	
SERVICES, INC.; PHYSICIAN PRACTICE	:	
SUPPORT, LLC; ELIGIBILITY SCREENING	:	
SERVICES, LLC; W. LARRY CASH; RACHEL	:	
SEIFERT; ADAM FEINSTEIN; AND CREDIT	:	
SUISSE SECURITIES (USA) LLC,	:	
	:	
Defendants.	:	
-----	:	X

**PLAINTIFFS' RESPONSE TO
QUORUM HEALTH CORPORATION'S MOTION TO INTERVENE**

Plaintiffs Daniel H. Golden., as Litigation Trustee of the QHC Litigation Trust (the “Trust”), and Wilmington Savings Fund Society, FSB (“WSFS” or the “Indenture Trustee”), solely in its capacity as the Indenture Trustee under that certain indenture (the “Indenture”), dated as of April 22, 2016 for the unsecured 11.625% Senior Notes due April 2023 (the “Senior Notes”), submit this Response to the Motion to Intervene (the “Motion”) filed by Quorum Health Corporation (“Reorganized Quorum”).

Plaintiffs support the Motion and request that it be granted. Reorganized Quorum and Defendants have agreed to a briefing schedule in which Defendants’ answering brief in response to the Motion is due on March 7, 2022, and Reorganized Quorum’s reply brief in support of the Motion is due on March 21, 2022 (Docket No. 57). In light of this briefing schedule, Plaintiffs reserve the right to submit a further brief in support of the Motion on March 21, 2022.

DATED: February 22, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Timothy P. Cairns

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*Counsel for Daniel H. Golden, as Litigation Trustee
for the QHC Litigation Trust and Wilmington
Savings Fund Society, FSB, solely in its capacity as
Indenture Trustee*